

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

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In re: MICROFIBRES, INC. : Bk. No. 16-10154
DAWN PHILLIPS and CEDRIC WILLIAMS : Chapter 7
on behalf of themselves and all others similarly
situated, :
Plaintiffs, : A.P. No.16-01002
MICROFIBRES, INC., :
Debtor :
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**PLAINTIFFS' MOTION FOR (A) CLASS CERTIFICATION, (B) APPOINTMENT OF
CLASS REPRESENTATIVES, (C) APPOINTMENT OF CLASS COUNSEL, (D)
APPROVAL OF THE FORM AND MANNER OF CLASS NOTICE, AND (E) SUCH
OTHER AND FURTHER RELIEF AS THIS COURT MAY DEEM APPROPRIATE**

Plaintiffs Dawn Phillips and Cedric Williams (“Plaintiffs”) move this Honorable Court for an order: (a) certifying a class pursuant to the Fed. R. Bankr. P. 7023 and Fed. R. Civ. P. 23 comprised of the Plaintiffs and the 185 or so other similarly situated former employees of Microfibres, Inc. (“Debtor”) who worked at or reported to either of the facilities located at 1 Moshassuck Street, Pawtucket, RI 02860 (the “RI Facility”); or at 3821 Kimwell Drive, Winston-Salem NC 27114 (the “NC Facility”) (collectively the “Facilities”) and were terminated, without cause on their part, on or about January 28, 2016, within thirty days of that date or thereafter, as part of, or as the reasonably expected consequence of, the plant closings ordered by the Debtor on or about January 28, 2016, who do not file a timely request to opt-out of the class (“Class”); (b) appointing Plaintiffs Dawn Phillips and Cedric Williams as Class Representatives; (c) appointing Lankenau & Miller, LLP, The Gardner Firm, P.C., and Gursky | Wiens as Class Counsel; (d) approving the form and manner of Notice to the Class; and (e)

granting such other and further relief as this Court may deem proper.

In support hereof, Plaintiffs submit a memorandum of law, declarations of Plaintiffs and Plaintiffs' counsel, a proposed class notice, and a proposed order.

Dated: May 25, 2016

Respectfully submitted,

ATTORNEYS FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2016, I filed the forgoing with the Court via CM/ECF thereby causing service on counsel of record including:

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/s/Mary E. Olsen
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